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CHILDREN'S HEALTH DEFENSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHILDREN'S HEALTH DEFENSE,

Plaintiff,

v.

FACEBOOK, INC., ET AL.,

Defendants.

Case No. 3:20-cv-05787-SI

**STIPULATION TO ENLARGE TIME
TO RESPOND TO COMPLAINT PER
L.R. 6-1(A)**

Pursuant to Civil Local Rule 6-1(a), Defendants Facebook, Inc., Mark Zuckerberg, PolitiFact, and The Poynter Institute for Media Studies, Inc. (“Defendants”) and Plaintiff Children’s Health Defense (“Plaintiff”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Plaintiff filed the Complaint (Dkt. 1) on August 17, 2020;

WHEREAS, Plaintiff served the Complaint on Defendant Facebook, Inc. on August 19, 2020. (Dkt. 16). A summons also issued to Mark Zuckerberg on August 19, 2020. (Dkt. 7). Service was also attempted on The Poynter Institute for Media Studies on August 19, 2020, and on PolitiFact on August 27, 2020.¹

WHEREAS, Defendant Facebook, Inc.’s response to the Complaint is currently due September 9, 2020. Assuming Mr. Zuckerberg was served the same day as Facebook, and barring any service defects, Defendant Mr. Zuckerberg’s response to the Complaint would also be due on September 9, 2020. Barring any service defects, Defendants The Poynter Institute for Media Studies, Inc.’s and PolitiFact’s response to the Complaint would be due on September 9, 2020 and September 17, 2020.

WHEREAS, these Defendants only recently retained present counsel to represent them in this action.

WHEREAS, Defendants have asked for, and Plaintiff has consented to, an extension of time for Defendants to answer, move, or otherwise respond to the Complaint, up to and including October 23, 2020. This represents a 44-day extension with respect to Defendants Facebook, Inc., Mark Zuckerberg, and The Poynter Institute for Media Studies, Inc., and a 36-day extension with respect to Defendant PolitiFact.

WHEREAS, the parties also wish to align the response dates and briefing schedule for Defendants Facebook, Inc., Mark Zuckerberg, The Poynter Institute for Media Studies, Inc., and PolitiFact.

WHEREAS, this is the first extension of time in this matter and will not affect any other date already set by Court order.

¹ Defendants reserve their rights to raise any jurisdictional, service-related, or venue-related challenges in response to the Complaint, and this Stipulation does not waive any such rights.

1 **IT IS HEREBY STIPULATED AND AGREED** by Plaintiff and Defendants, pursuant to
2 Civil Local Rule 6-1(a), to enlarge the time for Defendants to answer, move, or otherwise respond
3 to the Complaint up to and including October 23, 2020.
4

5 Dated: September 9, 2020

WILMER CUTLER PICKERING, HALE AND
DORR LLP

6 By: /s/ Sonal N. Mehta
7 SONAL N. MEHTA

8 *Attorney for Defendants*
9 Facebook, Inc. and Mark Zuckerberg
10

11 Dated: September 9, 2020

JASSY VICK CAROLAN LLP

12 By: /s/ Kevin L. Vick
13 KEVIN L. VICK

14 *Attorney for Defendants*
15 The Poynter Institute for Media Studies, Inc, and
16 PolitiFact

17 Dated: September 9, 2020

By: /s/ Roger Ian Teich
ROGER IAN TEICH

18 *Attorney for Plaintiff*
19 Children's Health Defense
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation To Enlarge Time To Respond To Complaint. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatures have concurred in this filing.

Dated: September 9, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2020, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

Dated: September 9, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta